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VIA EMAIL & FAX

Cynthia Burton
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Facsimile: 512-495-9139

RE: *Cole v. Livingston, et al.*, No. 4:14-cv-01698; U.S. District Court, Southern District of Texas, Houston Division, and other heat-related cases

Dear Cynthia,

Pursuant to Defendants' offer, Plaintiffs in *Cole v. Livingston*, *Webb v. Livingston*, *Adams v. Livingston*, *Caddell v. Livingston*, *Hinojosa v. Livingston*, and *Martone v. Livingston* need access to the Pack, Gurney, Hodge, Michael, Huntsville, and Garza West Units for the expert witness Eldon Vail. Secretary Vail will need the ability to visit inmate housing areas, the chow hall(s), each designated respite area, the infirmary, the most direct route from the location where each decedent was found to an ambulance accessible exit, the most direct route from the location where each decedent was found to the infirmary, the pill window, the space where inmates are made to wait in front of the pill window, the searcher's desk, the commissary, and anywhere Defendants in any of the cases contend a decedent had access to during the week prior to each of their deaths.

Secretary Vail and Plaintiffs' counsel are available to schedule these visits during the week of August 29, 2016. Please let us know by July 1, otherwise Plaintiffs plan to address this with the Court.

Sincerely

Scott Medlock

Cc:

Wallis Nader
Michael Singley
Jeremy Doyle
Nathan Smith

Lee Haney
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